

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Obj. Deadline: May 16, 2024 at 4:00 p.m. ET

**TENTH MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS  
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION  
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM SEPTEMBER 1, 2023 THROUGH AND INCLUDING SEPTEMBER 30, 2023**

<b>Name of Applicant</b>	<b>Ernst &amp; Young LLP</b>
Authorized to Provide Professional Services to:	the Debtors and Debtors-in-Possession
Date of Retention:	January 17, 2023 <i>nunc pro tunc</i> to November 28, 2022
Period for which compensation and reimbursement is sought:	September 1, 2023 through September 30, 2023
Amount of Compensation sought as actual, reasonable and necessary:	\$1,356,469.80
80% of Compensation sought as actual, reasonable and necessary:	\$1,085,175.84
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$9,754.18

This is a(n) X monthly \_\_\_\_ interim \_\_\_\_ final application. No prior application has been filed with respect to this Fee Period.

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

**PRIOR MONTHLY FEE STATEMENTS FILED**

Dated Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fee	Approved Expenses
D.I. 847 filed on March 10, 2023	November 28, 2023 through December 31, 2023	\$1,264,113.80	\$12,330.63	\$2,086,386.45	\$43,916.74
D.I. 1500 filed on May 16, 2023	January 1, 2023 through January 31, 2023	\$1,130,705.00	\$32,893.58		
D.I. 1627 filed on June 13, 2023	February 1, 2023 through February 28, 2023	\$1,215,238.75	\$10,381.09		
D.I. 1932 filed on July 27, 2023	March 1, 2023 through March 31, 2023	\$1,596,707.00	\$26,108.75		
D.I. 2985 filed on October 3, 2023	April 1, 2023 through April 30, 2023	\$1,372,281.75	\$7,276.19		
D.I. 3377 filed on October 25, 2023	May 1, 2023 through May 31, 2023	\$1,327,255.00	\$17,767.20		
D.I. 5317 filed on January 3, 2024	June 1, 2023 through June 30, 2023	\$1,428,255.75	\$4,846.35		

**SUMMARY OF BILLING BY PROFESSIONAL**  
**SEPTEMBER 1, 2023 THROUGH AND INCLUDING SEPTEMBER 30, 2023**

<b>Name</b>	<b>Type</b>	<b>Rank</b>	<b>Hours</b>	<b>Hourly Rate</b>	<b>Total Individual Fees</b>
Lowery,Kristie L	Billable	National Partner/Principal	27.90	1,040.00	29,016.00
McComber,Donna	Billable	National Partner/Principal	16.90	1,040.00	17,576.00
Stevens,Matthew Aaron	Billable	National Partner/Principal	0.50	1,040.00	520.00
Bailey,Doug	Billable	Partner/Principal	57.80	866.00	50,054.80
Bastienne,Oliver	Billable	Partner/Principal	5.00	866.00	4,330.00
Buduguntae,Shashanka R	Billable	Partner/Principal	2.80	866.00	2,424.80
Cavusoglu,Coskun	Billable	Partner/Principal	1.20	866.00	1,039.20
Delff,Björn	Billable	Partner/Principal	1.50	866.00	1,299.00
Eken,Baris	Billable	Partner/Principal	0.80	866.00	692.80
Erdem,Ersin	Billable	Partner/Principal	15.60	866.00	13,509.60
Farrar,Anne	Billable	Partner/Principal	0.30	866.00	259.80
Ferris,Tara	Billable	Partner/Principal	0.80	866.00	692.80
Karner,Regina	Billable	Partner/Principal	0.30	866.00	259.80
LaGarde,Stephen	Billable	Partner/Principal	1.20	866.00	1,039.20
Leston,Juan	Billable	Partner/Principal	9.00	866.00	7,794.00
Liasis,George	Billable	Partner/Principal	0.50	866.00	433.00
Liassides,Petros	Billable	Partner/Principal	2.10	866.00	1,818.60
Lovelace,Lauren	Billable	Partner/Principal	8.50	866.00	7,361.00
Nakagami,Jun	Billable	Partner/Principal	1.00	866.00	866.00
Osmers,Maren	Billable	Partner/Principal	2.30	866.00	1,991.80
Rumford,Neil	Billable	Partner/Principal	3.20	866.00	2,771.20
Shea JR,Thomas M	Billable	Partner/Principal	41.10	866.00	35,592.60
Socratous,Christoforos	Billable	Partner/Principal	0.50	866.00	433.00
Walker,Rachael Leigh Braswell	Billable	Partner/Principal	16.50	866.00	14,289.00
Borts,Michael	Billable	Managing Director	28.20	814.00	22,954.80
Bost,Anne	Billable	Managing Director	67.60	814.00	55,026.40
DeVincenzo,Jennie	Billable	Managing Director	18.10	814.00	14,733.40
Flagg,Nancy A.	Billable	Managing Director	7.70	814.00	6,267.80
Gartin,Randell J.	Billable	Managing Director	0.50	814.00	407.00
Ritz,Amy Felice	Billable	Managing Director	0.50	814.00	407.00
Soderman,Kathy	Billable	Managing Director	0.80	814.00	651.20
Akman,Erdem	Billable	Senior Manager	0.80	683.00	546.40
Berman,Jake	Billable	Senior Manager	6.90	683.00	4,712.70
Bruns,Alexander	Billable	Senior Manager	3.70	683.00	2,527.10
Cummings,Amanda	Billable	Senior Manager	8.00	683.00	5,464.00
Devona Bahadur,Michele	Billable	Senior Manager	2.20	683.00	1,502.60
Espley-Ault,Olivia	Billable	Senior Manager	4.80	683.00	3,278.40
Faerber,Anna	Billable	Senior Manager	18.50	683.00	12,635.50
Gil Diez de Leon,Marta	Billable	Senior Manager	8.30	683.00	5,668.90
Goto,Keisuke	Billable	Senior Manager	8.20	683.00	5,600.60

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Gursoy,Damla	Billable	Senior Manager	2.40	683.00	1,639.20
Haas,Zach	Billable	Senior Manager	3.80	683.00	2,595.40
Healy,John	Billable	Senior Manager	27.00	683.00	18,441.00
Hernandez,Nancy I.	Billable	Senior Manager	27.80	683.00	18,987.40
Jayanthi,Lakshmi	Billable	Senior Manager	4.40	683.00	3,005.20
Jimenez,Joseph Robert	Billable	Senior Manager	13.20	683.00	9,015.60
Katsnelson,David	Billable	Senior Manager	15.50	683.00	10,586.50
Kedia,Nupur	Billable	Senior Manager	7.50	683.00	5,122.50
Knüwer,Stephanie	Billable	Senior Manager	13.40	683.00	9,152.20
Krug,Judith	Billable	Senior Manager	3.50	683.00	2,390.50
Matsuo,Eiko	Billable	Senior Manager	2.50	683.00	1,707.50
Mosdzin,Dennis	Billable	Senior Manager	47.00	683.00	32,101.00
Musano,Matthew Albert	Billable	Senior Manager	19.10	683.00	13,045.30
Nunez,Paloma	Billable	Senior Manager	1.80	683.00	1,229.40
Owsley,John Christopher	Billable	Senior Manager	0.50	683.00	341.50
Papachristodoulou,Elpida	Billable	Senior Manager	4.20	683.00	2,868.60
Pawa,Kunal	Billable	Senior Manager	1.00	683.00	683.00
Raulli,Lindsay Elizabeth	Billable	Senior Manager	1.00	683.00	683.00
Rule,Martin Daniel	Billable	Senior Manager	0.60	683.00	409.80
Schwarzwälder,Christian	Billable	Senior Manager	2.60	683.00	1,775.80
Staromiejska,Kinga	Billable	Senior Manager	8.20	683.00	5,600.60
Tong,Chia-Hui	Billable	Senior Manager	62.20	683.00	42,482.60
Wrenn,Kaitlin Doyle	Billable	Senior Manager	87.40	683.00	59,694.20
Yang,Rachel Sim	Billable	Senior Manager	1.20	683.00	819.60
Billings,Phoebe	Billable	Manager	11.70	551.00	6,446.70
Bouza,Victor	Billable	Manager	11.20	551.00	6,171.20
Carreras,Stephen	Billable	Manager	1.50	551.00	826.50
Chang-Waye,Amanda	Billable	Manager	5.60	551.00	3,085.60
Craven,Simone	Billable	Manager	2.00	551.00	1,102.00
Davis,Kathleen F.	Billable	Manager	0.90	551.00	495.90
Dugasse,Annie	Billable	Manager	14.30	551.00	7,879.30
Dulceak,Crystal	Billable	Manager	0.70	551.00	385.70
Gorman,Doug A	Billable	Manager	1.20	551.00	661.20
Hammon,David Lane	Billable	Manager	104.80	551.00	57,744.80
Jena,Deepak	Billable	Manager	1.00	551.00	551.00
Katelas,Andreas	Billable	Manager	27.00	551.00	14,877.00
McPhee,Tiffany	Billable	Manager	0.20	551.00	110.20
Mistler,Brian M	Billable	Manager	68.00	551.00	37,468.00
Shabanaj,Vlora	Billable	Manager	19.70	551.00	10,854.70
Shah,Naz	Billable	Manager	9.20	551.00	5,069.20
Short,Victoria	Billable	Manager	52.60	551.00	28,982.60
Srivastava,Nikita Asutosh	Billable	Manager	25.80	551.00	14,215.80
Tsikkouris,Anastasios	Billable	Manager	10.60	551.00	5,840.60

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Tyllirou, Christiana	Billable	Manager	1.00	551.00	551.00
Varma, Bharath	Billable	Manager	4.00	551.00	2,204.00
Zheng, Eva	Billable	Manager	123.50	551.00	68,048.50
Ancona, Christopher	Billable	Senior	101.80	415.00	42,247.00
Asim, Malik Umer	Billable	Senior	4.70	415.00	1,950.50
Borchers, Fabian	Billable	Senior	1.70	415.00	705.50
Bote, Justin	Billable	Senior	6.50	415.00	2,697.50
Camargos, Lorraine Silva	Billable	Senior	7.40	415.00	3,071.00
Carver, Cody R.	Billable	Senior	15.50	415.00	6,432.50
Cassandra Gonzalez-Canal	Billable	Senior	38.00	415.00	15,770.00
Chachan, Aparajita	Billable	Senior	19.80	415.00	8,217.00
Di Stefano, Giulia	Billable	Senior	68.60	415.00	28,469.00
Figuroa, Carolina S	Billable	Senior	32.40	415.00	13,446.00
Fitzgerald, Kaitlin Rose	Billable	Senior	49.30	415.00	20,459.50
Garcia, Casey	Billable	Senior	13.00	415.00	5,395.00
Glattstein, Arielle	Billable	Senior	20.50	415.00	8,507.50
Hall, Emily Melissa	Billable	Senior	136.40	415.00	56,606.00
Hayashi, Rina	Billable	Senior	5.50	415.00	2,282.50
Houareau, Tina	Billable	Senior	5.60	415.00	2,324.00
Huang, Fei Yu	Billable	Senior	4.90	415.00	2,033.50
Huang, Ricki	Billable	Senior	55.00	415.00	22,825.00
John Mathew, Abel	Billable	Senior	0.80	415.00	332.00
MacLean, Corrie	Billable	Senior	37.50	415.00	15,562.50
Marlow, Joe	Billable	Senior	11.50	415.00	4,772.50
Molnar, Evgeniya	Billable	Senior	89.40	415.00	37,101.00
Odermatt, Jasmin	Billable	Staff	1.30	236.00	306.80
Ott, Daniel	Billable	Senior	8.00	415.00	3,320.00
Perez, Ellen Joy	Billable	Senior	17.00	415.00	7,055.00
Sangster, Mark	Billable	Senior	4.00	415.00	1,660.00
Skarou, Tonia	Billable	Senior	6.80	415.00	2,822.00
Sun, Yuchen	Billable	Senior	3.80	415.00	1,577.00
Themistou, Victoria	Billable	Senior	2.30	415.00	954.50
Wesolowski, Jennifer L	Billable	Senior	1.50	415.00	622.50
Agar, Oguzkaan	Billable	Staff	15.00	236.00	3,540.00
Allen, Jenefier Michelle	Billable	Staff	6.20	236.00	1,463.20
Bhardwaj, Kunal	Billable	Staff	5.60	236.00	1,321.60
Choudary, Hira	Billable	Staff	35.50	236.00	8,378.00
Eikenes, Ryan	Billable	Staff	104.10	236.00	24,567.60
Gabison, Salome	Billable	Staff	73.60	236.00	17,369.60
Geisler, Arthur	Billable	Staff	21.30	236.00	5,026.80
Hall, Olivia	Billable	Staff	13.20	236.00	3,115.20
Hebel, Pia	Billable	Staff	20.70	236.00	4,885.20
Huang, Yuan	Billable	Staff	38.70	236.00	9,133.20

<b>Name</b>	<b>Type</b>	<b>Rank</b>	<b>Hours</b>	<b>Hourly Rate</b>	<b>Total Individual Fees</b>
Kawahara,Riku	Billable	Staff	9.00	236.00	2,124.00
Neziroski,David	Billable	Associate	19.50	365.00	7,117.50
Nguyen,Thinh	Billable	Staff	97.40	236.00	22,986.40
Ortiz,Daniella	Billable	Staff	1.00	236.00	236.00
Pastrikou,Eleni	Billable	Staff	8.50	236.00	2,006.00
Pierce,Brandon	Billable	Staff	4.00	236.00	944.00
Ryan,Andersen	Billable	Staff	10.50	236.00	2,478.00
Sydney Marshall	Billable	Staff	2.50	236.00	590.00
Vasic,Dajana	Billable	Staff	3.70	236.00	873.20
Wong,Maddie	Billable	Staff	6.70	236.00	1,581.20
Zhang,Shannon	Billable	Staff	13.60	236.00	3,209.60
Zhang,Yuwan	Billable	Staff	28.80	236.00	6,796.80
Zhuo,Melody	Billable	Staff	64.20	236.00	15,151.20
Scott,James	Billable	Client Serving Contractor JS	47.40	600.00	28,440.00
Knoeller,Thomas J.	Billable	Client Serving Contractor TJK	1.80	430.00	774.00
Bieganski,Walter	Billable	Client Serving Contractor WB	32.20	200.00	6,440.00
<b>Totals</b>			<b>2,711.60</b>		<b>\$1,356,469.80</b>

<sup>1</sup> Travel fees are billed out at 50% bill rate

**Blended Hourly Rate: \$500.25**

**STATEMENT OF FEES BY PROJECT CATEGORY**  
**SEPTEMBER 1, 2023 THROUGH AND INCLUDING SEPTEMBER 30, 2023**

<b>Project Category</b>	<b>Project Category Description</b>	<b>Hours</b>	<b>Fees</b>
ACR Bookkeeping/ACR Statutory Reporting	This category includes time spent compile information provided by client, the annual balance sheet, and related statements of income, retained earnings, and cash flows in accordance with the International Standard on Related Services (ISRS) 4410 (Revised), Compilation Engagements, or local regulatory requirements, as appropriate. This is to assist client in presenting financial information in the form of financial statements	399.50	182,851.90
Fee/Employment Applications	This category relates to the preparation of EY's employment application and planning and coordinating the professionals' time protocols, preparation of monthly fee statements, preparation of interim fee applications, invoices, and responding to inquiries	19.50	7,117.50
Information Reporting	Reporting of income paid to certain US-based investors, vendors, and independent contractors	0.80	692.80
IRS Audit Matters	Responding to the inquiries of the IRS related to current/prior tax years.	65.60	37,021.20
Non US Tax	Taxation of all non-US based or related activities and taxpayers	366.10	191,002.10
Payroll Tax	Taxation of Global and US-based payroll and employment tax requirements	307.80	192,800.90
Project Management Office Transition	Preparation for, attendance at and participation in periodic meetings, discussions and analyses regarding coordination of EY services and international teams in order to align on information, assumptions, and issues.	199.80	93,367.40
Tax Advisory	The projects covered by on-call tax advisory services include assistance with tax issues by answering one-off questions, drafting memos describing how specific tax rules work, assisting with general transactional issues, and assisting Client in connection with International Tax Services dealings with tax authorities (other than representing Client in an examination or an appeal before the IRS or other taxing authority).	91.90	58,605.00
Technology	Ingestion, transformation, and analysis of FTX data to be leveraged by the tax workstreams in order to facilitate the preparation and completion of deliverables.	3.40	2,251.40
Transfer Pricing	Determine arm's length pricing in related-party transactions	300.60	165,494.40
US Income Tax	Taxation of all US-based or related activities and taxpayers	204.50	116,297.00

<b>Project Category</b>	<b>Project Category Description</b>	<b>Hours</b>	<b>Fees</b>
US International Tax	Taxation of all non-US based or related activities as it impacts on US based taxpayers	111.00	50,666.20
US State and Local Tax	Taxation of all US-based or related activities and taxpayers as assessed by each state and local jurisdiction	605.80	241,598.50
Value Added Tax	Taxation of non-US based indirect based or related activities and taxpayers	35.30	16,703.50
<b>Total</b>		<b>2,711.60</b>	<b>\$1,356,469.80</b>



**SUMMARY OF ACTUAL AND NECESSARY EXPENSES**

<b>Expense Category</b>		<b>Expense Amount</b>
Ground Transportation		12.90
IT Data		5,396.00
Value Added Tax (VAT)		4,345.28
<b>Total</b>		<b>\$9,754.18</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**TENTH MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS  
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION  
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD  
FROM SEPTEMBER 1, 2023 THROUGH AND SEPTEMBER 30, 2023**

Ernst & Young LLP (“EY LLP”), Tax Services Provider to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), hereby submits this tenth monthly fee statement (this “Monthly Fee Statement”) for compensation for professional services rendered and expenses incurred for the period from September 1, 2023 through and including September 30, 2023 (the “Fee Period”). In support of the Monthly Fee Statement, EY LLP respectfully states as follows:

**Background**

1. On November 11 and November 14, 2022,<sup>2</sup> the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) voluntary petitions for relief under title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended or modified,

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> November 11, 2022 is the petition date for all Debtors, except for Debtor West Realm Shires Inc.

the “Bankruptcy Code”). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors’ cases (the “Chapter 11 Cases”) was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. On January 17, 2023, the Court entered the Order Authorizing the Retention and Employment of EY LLP as Tax Services Provider *Nunc Pro Tunc* to November 28, 2022 [D.I. 505] authorizing the retention and employment of EY LLP as the Debtors’ Tax Services Provider, *nunc pro tunc* to November 28, 2022.

3. On January 9, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435] (the “Interim Compensation Order”).

4. On March 8, 2023, the Court entered the Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses [D.I. 834] appointing Katherine Stadler (the “Fee Examiner”) to serve as the fee examiner in these Chapter 11 Cases and establishing certain procedures in connection therewith.

### **Relief Requested**

5. By this Monthly Fee Statement and in accordance with the Interim Compensation Order, EY LLP makes this application for (i) allowance of compensation as an administrative expense of the Debtors’ estates in the amount of \$1,356,469.80 for reasonable and necessary professional services rendered, (ii) payment of compensation in the amount of 80%

thereof (in the amount of \$1,085,175.84) and (iii) payment of \$9,754.18 for actual and necessary expenses incurred.

**a. Compensation Requested**

6. The services performed by EY LLP during the Fee Period included tax services. Attached hereto as Exhibit A is a detailed itemization, by project category, of all services performed by EY LLP with respect to the Chapter 11 Cases during the Fee Period. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

7. The timekeepers who rendered services related to each category are identified in Exhibit A, along with the number of hours for each individual and the total compensation sought by each category. All services for which EY LLP requests compensation were performed for, or on behalf of, the Debtors.

**b. Expense Reimbursement**

8. EY LLP incurred out-of-pocket expenses during the Fee Period in the amount of \$9,754.18. Attached hereto as Exhibit B is a description of the expenses actually incurred by EY LLP in the performance of services rendered as Tax Services Provider to the Debtors. The expenses are broken down into categories of charges, which may include, among other things, the following charges: airfare, lodging, ground transportation, working meals, and other expenses. Value Added Tax (“VAT”) is a consumption tax in which certain foreign firms are required by local tax authority regulations to charge for services performed during this engagement.

9. In accordance with section 330 of the Bankruptcy Code, EY LLP seeks reimbursement only for the actual cost of such expenses to EY LLP. EY LLP submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Monthly Fee Statement, requests reimbursement of the same.

**Valuation of Services**

10. Professionals of EY LLP have expended a total of 2,711.60 hours in connection with this matter during the Fee Period.

11. The amount of time spent by each of the professionals' providing services to the Debtors for the Fee Period is set forth in Exhibit A. The rates are EY LLP's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by EY LLP for the Fee Period as Tax Services Provider for the Debtors in the Chapter 11 Cases is \$1,356,469.80.

12. EY LLP believes that the time entries included in Exhibit A attached hereto and the expense breakdown set forth in Exhibit B attached hereto are in compliance with the requirements of Local Rule 2016-2.

13. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given the complexities of these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under this title.

**Certificate of Compliance and Waiver**

14. The undersigned representative of EY LLP certifies that he has reviewed the requirements of Local Rules 2016-2 and that the Monthly Fee Statement substantially complies with such rule. To the extent that the Monthly Fee Statement does not comply in all

respects with the requirements of Local Rule 2016-2, EY LLP believes that such deviations are not material and respectfully requests that any such requirements be waived.

**Notice and No Prior Request**

15. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors and (d) all parties required to be given notice in the Interim Compensation Order. EY LLP submits that no other or further notice is necessary.

16. No prior request for the relief sought in this Monthly Fee Statement has been made to this or any other Court.

WHEREFORE, EY LLP respectfully requests that the Bankruptcy Court (i) approve the Monthly Fee Statement and (ii) grant such further relief as is just and proper.

/s/ Thomas M. Shea  
Thomas M. Shea  
Partner/Principal  
Ernst & Young LLP